



Docket No.: 1405.1024

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of:

Masahide NODA et al.

Serial No. 09/628,352

Group Art Unit: 2153

Confirmation No. 3309

Filed: July 28, 2000

Examiner: Aaron N. Strange

For: COMMUNICATION PROMOTION METHOD AND SYSTEM

**BRIEF IN SUPPORT OF APPEAL**

Mail Stop Appeal Brief-Patents  
Commissioner for Patents  
PO Box 1450  
Alexandria, VA 22313-1450

Sir:

In response to the Final Office Action in the above-identified application, and pursuant to the Notice of Appeal filed on October 30, 2007, Applicants submit the present Brief with the fee of \$510.00 set forth by 1.17(c). A Petition for an Extension of Time and the required fee of \$460.00 requesting a one-month extension are concurrently filed herewith, extending the period for filing the Brief in Support of Appeal to January 30, 2008.

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02 FC:1402 510.00 DA

**(I) Real Party In Interest**

The real party in interest in the present appeal is the assignee Fujitsu Limited.

**(II) Related Appeals and Interferences**

The undersigned attorney, the appellant, and the assignee know of no related appeals or interferences which would be directly affected by or directly affect or have a bearing on the Board's decision in the present appeal.

**(III) Status of Claims**

Claims 1, 2, 5-8, 10-17, 19 and 21 are currently pending. Claims 1, 2, 5-8, 10-17, 19 and 21 stands finally rejected and are being appealed.

**(IV) Status of Amendments**

No amendments have been filed subsequent to the final rejection.

**(V) Summary of Claimed Subject Matter**

Independent Claim 1

Independent claim 1 is directed to a "communication promotion method used in a chat system having a plurality of chat devices" (see Specification, Fig. 1 and page 4, lines 22-24). The chat devices "share any of virtual chat spaces being configured on a network and which send and receive messages among themselves" (see Specification, page 4, line 24 to page 5, line 2).

The image representations and/or physical representations of chat participants (e.g. character) can be operated according to predetermined operation instructions received by the chat device over the network from a chat administrator of the chat space of the chat devices are linked or installed in the chat devices (see Specification, page 5, lines 3-6 and lines 19-20).

The chat administrator detects a "predetermined event that occurs within the chat space" (see Specification, Fig. 4, page 5, lines 7-8 and page 29, lines 17-21). Next, the chat administrator determines a "plurality of different correlated operation instructions that correspond to the detected event" (e.g. based on the detected event) in the chat space for operating the image representations and/or the physical representations (e.g. character) of the chat participants linked or installed in the chat devices (see Specification, page 5, lines 9-11 and page 17, lines 23-25). The chat administrator also determines a "plurality of different control instructions for each type of image representations and/or physical representations" (e.g.

character) among the plurality of chat participants linked or installed in the chat devices (see Specification, Figs. 2 and 3 and page 17, line 23 – page 18, line 10).

Further, the chat administrator determines “different chat device destinations corresponding to the determined plurality of the different operation instructions and the determined plurality of different control instructions for operating the image representations and/or the physical representations of the chat participants linked or installed in the different chat device destinations” (see Specification, page 5, lines 12-14 and page 18, lines 2-4). Finally, the chat administrator sends the determined plurality of the different operation instructions and/or control instructions corresponding to the event via the chat system to the determined corresponding different chat device destinations to operate the image representations and/or the physical representations of the chat participants linked or installed in the different chat device destinations (see Specification, page 5, lines 15-17, page 18, lines 7-20, and page 21, line 16 – page 22, line 5).

The “image representations and/or physical representations of the chat participants are operated by the sent determined plurality of the different operation instructions and/or control instructions corresponding to the event” (see Specification, page 22, lines 12-22).

#### Independent Claim 5

Independent claim 5 is directed to “an administration device” (see Specification, Fig. 2 and page 17, lines 14-15). The administration device is used in a chat system that has “a plurality of chat devices which share any number of virtual chat spaces being configured on a network and which send and receive messages among themselves” (see Specification, Figs. 1 and 5).

The administration device has “an association table” that relationally stores a predetermined event that occurs in a chat space with participating chat devices, a plurality of predetermined control instructions, and a plurality of predetermined different correlated operation instructions that corresponds to the predetermined event (see Specification, Fig. 3 and page 20, line 20 to page 21, line 2).

Further, the plurality of predetermined control instructions correspond to a plurality of types of image representations and/or physical representations among the chat devices (see Specification, page 20, lines 7-9 and 13-14). The plurality of predetermined different correlated operation instructions correspond to a plurality of different chat device destinations to operate image representations and/or physical representations of chat participants that are linked to or installed in the chat device destinations (see Specification, page 18, lines 7 – page 19, line 2).

The administration device also includes a chat event detector, an operation instruction determiner and a destination determiner. The chat event detector detects a “predetermined event in the chat space, based on the association table” (see Specification, Fig. 2 and page 17, lines 21-22). An operation instruction determiner determines the “plurality of the different operation instructions for the detected event, based on the association table” (see Specification, Figs. 2 and 3 and page 17, lines 23-25). A destination determiner determines the “corresponding plurality of the different chat device destinations to be transmitted the determined plurality of the different operation instructions, based on the association table” (see Specification, page 18, 1-6).

The administration device further includes a transmitter that transmits the determined plurality of the different control instructions and/or the determined plurality of the different operation instructions corresponding to the event via the chat system to the determined corresponding chat device destinations (see Specification, page 18, lines 7-10 and page 18, lines 21-25). The control instructions and/or the operation instructions are sent to operate the image representations and/or the physical representations of the chat participants that are linked to or installed in the chat device destinations (see Specification, page 18, lines 13-20).

Further, “the image representations and/or physical representations of the chat participants are operated by the transmitted determined plurality of the different control instructions and/or the determined plurality of the different operation instructions corresponding to the event” (see Specification, page 22, lines 12-22).

#### Independent Claim 10

Claim 10 is directed to “an administration device used in a chat system having a plurality of chat devices which share any of virtual chat spaces being configured on a network and which send and receive messages among themselves” (see Specification, Figs. 1, 3 and 5, page 1, lines 5-17 and page 17, lines 14-17). The administration device includes “an association table that relationally stores a predetermined event occurring in a chat space with participating chat devices” (see Specification, Fig. 3, page 7, lines 12-13 and page 20, lines 20-24).

The administration device includes a plurality of different correlated control instructions that correspond to the type of image representations and/or physical representations among the plurality of chat devices (see Specification, Fig. 3 and page 20, line 20 – page 21, line 2).

A plurality of different correlated operation instructions correspond to the predetermined event (see Specification, Fig. 3 and page 20, line 23 – page 21, line 2).

The plurality of different correlated operation instructions correspond to a plurality of different chat device destinations to operate image representations and/or physical representations of chat participants that are linked to or installed in the chat device destinations (see Specification, page 18, line 7 – page 19, line 2).

The administration device also includes a chat detector, a determiner, and a transmitter (see Specification, page 17, lines 15-17). The chat event detector detects a “predetermined event in the chat space, based on the association table” (see Specification, page 17, lines 20-22). The determiner determines the plurality of control instructions and/or the plurality of the different operation instructions for the detected event, based on the association table (see Specification, page 17, line 23 – page 18, line 1). The transmitter transmits the plurality of different control instructions and/or the determined plurality of the different operation instructions corresponding to the event to the plurality of different chat device destinations to operate the image representations and/or the physical representations of the chat participants that are linked to or installed in the chat device destinations (see Specification, page 18, line 7-23).

The “image representations and/or physical representations of the chat participants are operated by the transmitted plurality of different control instructions and/or the determined plurality of the different operation instructions corresponding to the event” (see Specification, page 22, lines 12-22).

#### Independent Claim 11

Claim 11 is directed to a “computer-readable recording medium recording an administration program controlling a chat administration device in a chat system” (see Specification, page 13, lines 7-10). A plurality of chat devices “share any of virtual chat spaces operating on a network and send and receive messages among themselves” (see Specification, page 13, lines 10-12). An “association table” is prepared which “relationally stores a predetermined event occurring in a chat space with participating chat devices, a plurality of predetermined control instructions that describe the type of image representations and/or physical representations of the participating chat devices, and a plurality of predetermined different correlated operation instructions that correspond to the predetermined event” (see Specification, page 13, lines 15-19).

The plurality of predetermined control instructions and the plurality of predetermined different correlated operation instructions correspond to a plurality of different chat device destinations to operate image representations and/or physical representations of chat

participants that are linked to or installed in the chat device destinations (see Specification, Fig. 3 and page 7, lines 9-12 and page 20, line 20 – page 25, line 6).

A predetermined event is detected in the chat space, based on the association table (see Specification, page 13, lines 20-21). The plurality of different control instructions and operation instructions for the detected event are determined, based on the association table (see Specification, page 13, lines 22-24 and page 18, lines 7-10 and lines 21-23).

The “corresponding plurality of the different chat device destinations” is determined to be transmitted the determined plurality of the different operation instructions, based on the association table (see Specification, page 14, lines 1-4).

The “determined plurality of the different control instructions and/or the determined plurality of the different operation instructions corresponding to the event via the chat system” is transmitted “to the determined corresponding chat device destinations to operate the image representations and/or the physical representations of the chat participants that are linked to or installed in the chat device destinations” (see Specification, page 14, lines 5-7).

The “image representations and/or physical representations of the chat participants are operated by the transmitted determined plurality of the different control instructions and/or the determined plurality of the different operation instructions corresponding to the event” (see Specification, page 20, lines 12-22).

#### Independent Claim 12

Claim 12 is directed to a “computer-readable recording medium recording an administration program controlling a chat administration device used in a chat system” (see Specification, page 14, lines 11-13). The chat system has “a plurality of chat devices which share any of virtual chat spaces being configured on a network and send and receive messages among themselves” (see Specification, page 14, lines 13-16).

An “association table” is prepared which “relationally stores a predetermined event occurring in a chat space with participating chat devices, a plurality of predetermined control instructions that describe the type of image representations and/or physical representations of the participating chat devices, and a plurality of predetermined different correlated operation instructions that correspond to the predetermined event” (see Specification, page 14, lines 18-22).

The “plurality of predetermined control instructions and the plurality of predetermined different correlated operation instructions correspond to a plurality of different chat device

destinations to operate image representations and/or physical representations of chat participants that are linked to or installed in the chat device destinations" (see Specification, Fig. 3 and page 20, line 20 – page 25, line 6).

A "predetermined event in the chat space" is detected "based on the association table" (see Specification, page 14, lines 23-24). The plurality of different control instructions and operation instructions for the detected event are determined based on the association table (see Specification, page 15, lines 1-2 and page 18, lines 7-10 and lines 21-23).

The "determined plurality of the different control instructions and/or the determined plurality of the different operation instructions corresponding to the event" is transmitted "to the plurality of different chat device destinations to operate the image representations and/or the physical representations of the chat participants that are linked to or installed in the chat device destinations" (see Specification, page 15, lines 3-5).

The "image representations and/or physical representations of the chat participants are operated by the transmitted determined plurality of the different control instructions and/or the determined plurality of the different operation instructions" (see Specification, page 22, lines 12-22).

#### Independent Claim 19

Claim 19 is directed to a system (see Specification, Figs. 1, 3 and 5). The system includes a plurality of different chat devices that share a virtual chat space on a network. The chat devices are configured to send and receive messages among themselves over the network (see Specification, page 1, lines 5-17).

A "plurality of different correlated control instructions correspond to a specific type of image representations and/or physical representations among the plurality of chat devices" (see Specification, Fig. 3, page 20, line 20 – page 21, line 2). A "plurality of different correlated operation instructions correspond to a predetermined event" (see Specification, Fig. 3, page 20, line 23 – page 21, line 2).

The system also includes a chat event detector, a determiner, and a transmitter (see Specification, page 17, lines 15-17). The chat event detector detects "a predetermined event occurring in the chat space and the types of image representations and/or physical representations existing in the chat space during the event, based on an association table that relationally stores predetermined events and types of image representations and/or physical representations" (see Specification, Figs. 2 and 3, page 8, lines 21-22 and page 17, lines 20-22).

The determiner determines the “plurality of different correlated operation instructions for the detected event, based on the association table, and for determining the plurality of different correlated control instructions for the detected types of image representations and/or physical representations existing in the virtual chat space, based on an association table” (see Specification, page 17, line 23 and page 18, line 6)

The transmitter transmits the “plurality of different control instructions and/or the determined plurality of different operation instructions corresponding to the event so that the plurality of different chat devices can operate the image representations and/or physical representations in the chat space” (see Specification, page 18, lines 7-20).

The “image representations and/or physical representations of the chat participants are operated by the transmitted plurality of different control instructions and/or the determined plurality of the different operation instructions corresponding to the event” (see Specification, page 22, lines 12-22).

#### Independent Claim 21

Claim 21 is directed to a system that includes “a virtual chat space on a network” (see Specification, Fig. 1 and page 16, line 23 – page 17, line 7).

The system has an “association table, corresponding to the virtual chat space” that “relationally stores a predetermined event, a predetermined control instruction, and a correlated operation instruction corresponding to the predetermined event” (see Specification, Fig. 3 and page 20, line 20 – page 21, line 2). The system also includes a plurality of different chat devices sharing the virtual chat space (see Specification, Fig. 1). The chat devices use the predetermined event and/or the predetermined control instruction to produce image representations and/or physical representations in the virtual chat space (see Specification, page 18, line 10 – page 19, line 14).

#### **(VI) Grounds of Rejection to be Reviewed on Appeal**

A. Claims 1, 5, 7, 8, 10-12, 19 and 21 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent Number 7,736,982, issued to Suzuki *et al.* (hereinafter referred to as Suzuki).

B. Claims 2 and 6 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Suzuki in view of U.S. Patent Number 6,119,147, issued to Toomey *et al.* (hereinafter referred to as Toomey).



C. Claim 13 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Suzuki in view of Applicant's Alleged Admitted Prior Art (hereinafter referred to as AAPA).

D. Claims 14-17 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Suzuki in view of U.S. Patent Number 5,491,743, issued to Shioo *et al.* (hereinafter referred to as Shioo).

**(VII) Argument**

A. Claims 1, 5, 7, 8, 10-12, 19 and 21 stand rejected as being allegedly anticipated by Suzuki.

**1. Background of the Reference on which the Rejection is Based**

According to Suzuki, in conventional virtual space display systems, the virtual space is displayed as a user interface of a specific application such as a combat simulation, electronic mail system or electronic conference system (see col. 1, lines 29-33). Users in this system can move their avatar but they cannot fully feel a sense of real existence in space (see col. 1, lines 33-38). Further, when the user avatars meet and talk with each other in the virtual space, their voices are merely transmitted and received and, therefore, the user cannot feel totally immersed in the virtual space (see Suzuki, col. 1, lines 39-45).

In Suzuki, a plurality of terminals are connected to a server and share a predetermined common virtual space (see Suzuki, Abstract). The terminals send to the server the position coordinates of the viewing points and direction of eyes of its user in the virtual space and the visual field image viewed from that viewing point is displayed on the display. As a result, each terminal generates an avatar image in the specified direction and at the specified position and displays it in the visual field.

**2. Relevant Law**

By its language, 35 U.S.C. § 102 requires that each and every element of a claim be present in a single cited reference to properly have the reference anticipate the claim. *See In re Bond*, 910 F.2d 831, 15 USPQ2d 1566, 1567 (Fed. Cir. 1992), *citing Diversitech Corp. v. Century Steps, Inc.*, 850 F.2d 675, 677, 7 USPQ2d 1315, 1317 (Fed. Cir. 1988); *Lindemann Maschinenfabrik v. American Hoist & Derrick Co.*, 730 F.2d 1452, 1458, 221 USPQ 481, 485 (Fed. Cir. 1984); *Minnesota Mining & Manufacturing Co. v. Johnson & Johnson Orthopaedics, Inc.*, 976 F.2d 1559, 24 USPQ2d 1321, 1326 (Fed. Cir. 1992); and *Elmer v. ICC Fabricating Inc.*, 67 F.3d 1571, 36 USPQ2d 1417, 1419 (Fed. Cir. 1995).

### **3. Application of the Relevant Law**

#### **Independent Claim 1**

Suzuki is related to a virtual space apparatus with avatars and speech (see Suzuki, Abstract, col. 1, lines 11-16, and Fig. 1). The present invention, on the other hand is related to a communication method in which a plurality of users in different environments chat simultaneously using characters (e.g. image representations and/or physical representations) corresponding to an event (see Specification, page 4, lines 14-19 and claim 1).

In claim 1 of the present invention, the chat administrator "determin[es] ... different chat device destinations corresponding to the ... plurality of different ... instructions for operating the image representation and/or the physical representations (e.g. characters) of the chat participants". In other words, the chat administrator determines which chat devices to send the instructions to for operation of the character (see Specification, page 19, lines 1-6 and page 21, line 16 – page 22, line 5).

Applicants respectfully submit that Suzuki does not disclose the above-mentioned feature as recited in claim 1. Rather, Suzuki describes a server receives position of avatars (e.g. viewing points and position information of the respective avatars) and the server transmits the position information to *all* terminals except the transmitting terminal (see Suzuki, col. 5, lines 50-67. Stated another way, Suzuki does not determine which terminals to send the position information of the avatar, but rather sends to *all* terminals the same position information of the avatar. In claim 1, on the other hand, as mentioned above, the chat administrator determines which chat devices to send the instructions to. Therefore, a person having ordinary skill in the art would clearly understand when reading claim 1 that different chat devices will receive different instructions for operation of the character which is not taught in Suzuki.

Further, the Office Action asserted that col. 8, line 15 – col. 9, line 16 of Suzuki teach the above-mentioned feature (see Office Action, page 5). However, col. 8, line 15- col. 9, line 16 of Suzuki is merely concerned with a description of the conditions that enable conversation between avatars and an embodiment of an apparatus which connects the speech channel between them on the basis of such condition. These conditions describe the distance between two avatars and their visual angles and direction of eyes. Further, the above-mentioned column describes an instance when a third avatar approaches an ongoing conversation between the two avatars (see Suzuki, col. 8, lines 53-65). In such a case, the voices of the two avatars are being sent to the third avatar. Further, voices between the first avatar and third avatar will now be sent to the second avatar. In other words, every avatar in the conversation will be able to here every

avatar's voice. Therefore, col. 8, line 15 – col. 9, line 16 of Suzuki cannot teach such a feature of determining different chat device destinations corresponding to the plurality of instruction since Suzuki is merely concerned with sending such voices to *all* avatars except for the avatar currently speaking.

Further, as mentioned above, Suzuki describes transmitting to *all* terminals except the transmitting terminal the position information of the avatar. However, in claim 1, the chat administrator *sends the determined instructions* corresponding to the event to the *corresponding chat devices to operate* the image representation and/or the physical representations (e.g. character) of the chat participants. Stated another way, according to Figure 3 of the present application, when an event such as “joining to a channel” occurs an operation instruction “welcome” is transmitted to a new participant and an operation instruction “greeting” is transmitted to existing participants (see Specification, page 21, line 16 – page 22, line 5. Therefore, according to the present application in claim 1, different instructions are transmitted to different corresponding chat devices and *not all* chat participants will receive the same instructions. Suzuki, however, describes the opposite, such that *all* terminals receive the same information.

Further, Applicants respectfully submit that Suzuki fails to teach “the image representations and/or physical representations of the chat participants are operated by the sent determined plurality of the different operation instructions and/or control instructions corresponding to the event” as recited in independent claim 1, for example.

According to Suzuki, when a user of each terminal moves and/or turns his avatar in the virtual space, the position information from the terminal is sent as part of a move message (see Suzuki, col. 6, lines 36-39). Further, based upon the above-mentioned discussion, a person of ordinary skill in the art would clearly understand that message being sent will be sent to *all* terminals except for the transmitting terminal. In claim 1, however, the character of the chat participants is operated by the sent determined different instructions *corresponding* to the event (see Specification, Fig. 3). In other words, not all chat participants will operate the character in the same manner, but rather the character will be operated based on the instruction corresponding to the event.

In light of the above-mentioned discussion, claim 1 is patentable over the reference.

Independent Claim 5

Regarding claim 5, for reasons similar to those discussed above with respect to claim 1, claim 5 is patentable over Suzuki and is further patentable for the additional reasons presented below.

In claim 5, a destination determiner *determin[es]* the *corresponding* plurality of different *chat device destinations* to be transmitted the determined plurality of the different operation instructions, *based on the association table*. In other words, the destination determiner determines which chat devices to send the operation instructions to. Further, the determination is based on the associated table (e.g. event table) (see Specification, Fig. 3 and page 21, lines 5-15).

According to Suzuki, as mentioned above, a connection control unit writes the received position information and the direction of the eyes in a position information table of the table memory corresponding with the respective terminals (see Suzuki, col. 5, lines 60-67). Such position information is transmitted to *all* terminals, as previously mentioned. In other words, all terminals will view the same avatar. This is not the same as claim 5 because in claim 5 the determiner determines the corresponding chat device destinations ... based on the association table. In Suzuki, the server does not transmit position information based upon any event table. Further, the server does not selectively send the position information to selective user terminal apparatuses, but rather sends the position information to *all* user terminal apparatuses so everyone can see the same avatar.

Therefore, it is respectfully submitted that claim 5 is patentable over Suzuki in light of the above-mentioned reasons.

Independent Claim 10

With respect to claim 10, for reasons similar to those discussed above, claim 10 is patentable over Suzuki and is further patentable for the additional reasons presented below.

In claim 10, "the plurality of ... instructions for the detected event" are determined "based on the association table". As a result, in claim 10, "the plurality of ... instructions *corresponding* to the event" is *transmitted* "to the ... plurality of different chat device destinations *to operate* the image representations and/or the physical representations of the chat participants".

Applicants respectfully submit that Suzuki fails to disclose such features as recited in claim 10. Suzuki is merely concerned with a virtual space apparatus with avatars and speech to be displayed to *all* terminals (see Suzuki, col. 5, lines 50-67). Further, Suzuki does not mention

an association table (e.g. event table) as recited in claim 10 (see Specification, Fig. 3). Rather, position information table of the table memory, in Suzuki, stores the position information and the directions of the eyes, so *all* users on the reception side can view the same avatar. The position information table, as described in Suzuki, does not store events and/or instructions that correspond to such events.

Therefore, it is respectfully submitted that claim 10 is patentable over Suzuki in light of the above-mentioned reasons.

#### Independent Claim 11

With respect to claim 11, for reasons similar to those discussed above, claim 11 is patentable over Suzuki and is further patentable for the additional reasons presented below.

Suzuki describes storing position information and the direction of eyes in a position information table. When the relationship between avatars satisfies a predetermined condition after updating the table, a connection is established between the terminals corresponding to the avatars. Further, once the condition is satisfied the connection control part instructs the channel interface part to connect the channel between the two terminals and writes the state of connection between the two avatars in a station of connection table (see Suzuki, col. 5, line 50 – col. 6, line 21).

However, in claim 11, “the plurality of different control instructions for the detected event” is determined “based on the association table” and “the plurality of the different operation instructions for the detected event” is determined “based on the association table”. Suzuki does not teach these features because Suzuki is merely concerned with establishing connection once a predetermined condition is met and storing a connection state in a state of connection table. Suzuki does not concern itself with *determining* control instructions and/or operation instructions for the *detected* event based on the association table as recited in claim 11.

Therefore, it is respectfully submitted that claim 11 is patentable over Suzuki in light of the above-mentioned reasons.

#### Independent Claim 12

With respect to claim 12, for reasons similar to those discussed above, claim 12 is patentable over Suzuki and is further patentable for the additional reasons presented below.

Suzuki describes that when the relationship between two arbitrary avatars satisfies a predetermined condition after the updating of the memory table, the terminals corresponding to the two avatars are connected to *enable* communication or conversation between the users of

these terminals. In other words, once a predetermined condition is satisfied, a connection is *established* between the two terminals. Claim 12, on the other hand, “a predetermined event in the chat space” is *detected* “based on the association table”. Suzuki does not describe such a feature since Suzuki describes setting up connection to enable conversation after the avatars satisfy a predetermined condition.

Therefore, it is respectfully submitted that claim 12 is patentable over Suzuki in light of the above-mentioned reasons.

#### Independent Claim 19

With respect to claim 19, for reasons similar to those discussed above, claim 19 is patentable over Suzuki and is further patentable for the additional reasons presented below.

In claim 19, a chat event detector *detect[s]* a predetermined *event* occurring in the chat space *and* the types of *image representations and/or physical representations* (e.g. characters) existing in the chat space during the event, based on an association table (e.g. event table) that relationally stores predetermined events and types of image representations and/or physical representations. Stated another way, a predetermined event and the types of characters corresponding to the events are detected based on the association (e.g. event) table (see Specification, Fig. 3).

Suzuki does not describe such features because Suzuki is merely concerned with setting up connection between the terminals once a predetermined condition is met (see Suzuki, col. 6, lines 1-6). Further, Suzuki cannot teach such a feature because in Suzuki there is no connection between any of the avatars until the condition is met. In claim 19, however, a predetermined event occurring in the chat space is *detected*. Stated another way, in claim 19 a connection has already been setup between chat devices and all that is being detected is an event that is occurring in the chat space.

Therefore, it is respectfully submitted that claim 19 is patentable over Suzuki in light of the above-mentioned reasons.

#### Independent Claim 21

With respect to claim 21, for reasons similar to those discussed above, claim 21 is patentable over Suzuki and is further patentable for the additional reasons presented below.

In Claim 21, “an association table ... relationally stores a predetermined event, a predetermined control instruction, and a correlated operation instruction corresponding to the predetermined event. “ The Office Action asserted that Fig. 7 (item 12E), Fig. 5 (items 53A and

53B) describe an association table. However, Applicants respectfully submit that Suzuki fails to disclose such an association table since Figs. 5 and 7 merely describe a position information table of the table memory and a management table memory, respectively. As previously mentioned the position information table stores position information and directions of eyes and does not store a predetermined event. Further, the management table memory stores the position coordinate and direction of eyes of the user's avatar inputted from the control input processing part (see Suzuki, col. 7, lines 15-20). However, the management table does not constitute an association table since the management table does not store predetermined events, predetermined control instructions and correlated operation instructions corresponding to the predetermined event as recited in claim 21. Therefore, neither Figs. 5 nor 7 describe an association table and neither do any of the other figures in Suzuki describe such an association table storing a predetermined event, control instruction and operation instructions corresponding to the predetermined event, as recited in claim 21.

Therefore, it is respectfully submitted that claim 21 is patentable over Suzuki.

B. Claims 2 and 6 stand rejected as being allegedly unpatentable over Suzuki in view of Toomey.

**1. Background of the References on which the Rejection is Based**

Toomey is related to a computer-supported collaborative work environment. In particular, Toomey is directed to a system for computer-mediated, multi-modal, asynchronous meetings in a virtual space that provides for enabling, reviewing and augmenting meetings that take place in a virtual environment (see Toomey, Abstract, col. 1, lines 8-14). Further, according to Toomey, a virtual environment enables a set of participants to meet and interact synchronously or asynchronously. The participants interact via avatars in a place-based, multi-modal document, which allows the participants to be in different locations (see Toomey, col. 1, line 45 – col. 2, line 2).

**2. Relevant Law**

To establish a *prima facie* case of obviousness, one of the three basic criteria that must be met is that the reference must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the references, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d

488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143 - § 2143.03 for decisions pertinent to each of these criteria.

The initial burden is on the examiner to provide some suggestion of the desirability of doing what the inventor has done. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985). See MPEP § 2144 - § 2144.09 for examples of reasoning supporting obviousness rejections.

### **3. Application of the Relevant Law**

Applicants respectfully submit that Toomey is merely concerned with providing an asynchronous work environment and does not teach or suggest the features of claims 1 and 5, for example. Therefore, claims 2 and 6, via their respective independent claims, are patentable over Suzuki in view of Toomey, as neither Suzuki nor Toomey, taken alone or in combination teaches or suggests the above-mentioned features of claims 1 and 5, for example.

Claims 2 and 6 are further patentable in light of the additional reasons presented below.

Toomey describes an asynchronous meeting system that uses a client server architecture in which the meeting is actually conducted. The server is programmed to *capture* (e.g. record) the events in the meeting as they occur to enable replaying or augmenting the recorded meeting (see Toomey, col. 6, lines 5-10). When the events are captured, the actual date and time is time-stamped to indicate the position in the sequence of events forming the meeting.

In claim 2, however, an originating address and a destination address of the operation instructions for operating the image representations and/or the physical representations of the chat participants, and *an event detection time*, are *sent to* the determined *corresponding different chat device destinations* together with the operation instructions. In other words, along with other information, an event detection time is *sent to* the corresponding different chat devices. Toomey does not teach or suggest such a feature since Toomey is merely concerned with capturing the events in the meeting as they occur to enable a user to replay the meeting. The object of claim 2 is not to replay the meeting, but to send, along with other information, the event detection time to the corresponding different chat devices.

Therefore, it is respectfully submitted that claim 2 is patentable over the references.



With respect to claim 6, Toomey does not teach or suggest the feature of the transmitter transmit[ting] an originating address of each determined operation instruction, a destination address of each determined operation instruction, and an event detection time, to each corresponding different chat device destinations together with the determined operation instruction. Rather, as mentioned above, Toomey is merely concerned with capturing events in a meeting to enable a user to replay the meeting. Toomey does not teach or suggest transmit[ting] an event detection time to each corresponding different chat device destinations.

Therefore, it is respectfully submitted that claim 6 is patentable over the references.

C. Claim 13 stands rejected as being allegedly unpatentable over Suzuki in view of Shiio.

**1. Background of the References on which the Rejection is Based**

AAPA is merely concerned with a character device capable of communicating by wire or wirelessly with a user terminal is operated. AAPA assumes that the character device is operated by reacting to keywords in an originated message (see Specification, page 3, lines 6-8). However, when a keyword is sent to a virtual chat space, the character devices of *all* users in the space perform only the same operation in response to the keyword (see Specification, page 3, lines 8-10).

**2. Relevant Law**

To establish a *prima facie* case of obviousness, one of the three basic criteria that must be met is that the reference must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the references, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143 - § 2143.03 for decisions pertinent to each of these criteria.

The initial burden is on the examiner to provide some suggestion of the desirability of doing what the inventor has done. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985). See MPEP § 2144 - § 2144.09 for examples of reasoning supporting obviousness rejections.

**3. Application of the Relevant Law**

Claim 13, via independent claim 5, is patentable over Suzuki in view of AAPA, as neither Suzuki nor AAPA, taken alone or in combination teaches or suggests the above-mentioned features of claim 5, for example.

Claim 13 is further patentable over Suzuki and AAPA, taken alone or in combination thereof, for the additional reasons presented below.

Claim 13 recites "the chat event detector detects the predetermined event from among a plurality of association table events comprising participate in the chat space, withdraw from the chat space, a number of chat participants in the chat space exceeds a predetermined number, a change in a mode or a topic of the chat space, a chat statement has not been made for longer than a specified time, a statement of a chat participant nickname or name, chatting is frequent, and specifying a chat participant image representation and/or physical representation".

AAPA does not teach or suggest the feature of a chat event detector detecting a predetermined event among a plurality of events from an association table since AAPA is merely concerned with character devices in a chat space performing the same operation in response to a keyword.

Further, on page 8 of the Office Action, the Examiner alleged that, "it has been taken that Applicant admits that one of ordinary skill in the art would have been known to detect the number of chat participants exceeds a predetermined number. . . ." Applicants respectfully submit that Applicants previously appropriately traversed the Examiner's common knowledge allegation. Therefore, Applicants have not admitted to the Examiner's assertion. The Examiner has not produced authority for the assertion.

Therefore, claim 13 is patentable over Suzuki and AAPA, taken alone or in combination thereof.

D. Claims 14-17 stand rejected as allegedly being unpatentable over Suzuki in view of Shiio.

**1. Background of the References on which the Rejection is Based**

Shiio is related to a virtual conference system and terminal apparatus used for holding a virtual conference using a plurality of virtual conference system terminal apparatuses connected to each other via communication lines such as telephone lines (see Shiio, Abstract, col. 1, lines 11-16). According to Shiio, in the conventional systems, to display faces of attendants on each terminal apparatus, video images obtained by photographing faces of attendants are transmitted to the respective user terminal apparatuses. As a result, the conventional system hardly

proceeds on a real-time basis and that each user terminal apparatus is costly (see Shiio, col. 1, lines 29-44). Therefore, Shiio is directed to enable a conference to proceed in an intuitive, clear, and effective manner.

To obtain the above object, the user terminal apparatus has a personal computer (PC). The PC has an agent control section that controls an overall view of the conference room and the displayed animated characters (e.g. agents) representing operators in the virtual conference room window (see Shiio, col. 5, lines 29-31 and 49-55).

## **2. Relevant Law**

To establish a *prima facie* case of obviousness, one of the three basic criteria that must be met is that the reference must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the references, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143 - § 2143.03 for decisions pertinent to each of these criteria.

The initial burden is on the examiner to provide some suggestion of the desirability of doing what the inventor has done. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985). See MPEP § 2144 - § 2144.09 for examples of reasoning supporting obviousness rejections.

## **3. Application of the Relevant Law**

Claims 14-17, via their respective independent claim, is patentable over Suzuki in view of Shiio, as neither Suzuki nor Shiio, taken alone or in combination teaches or suggests the above-mentioned features of claims 1 and 5, for example.

Claim 14 is further patentable over Suzuki and Shiio, taken alone or in combination thereof, for the additional reasons presented below.

According to Shiio, when a plurality of operators simultaneously request operation rights of a chalkboard, for example, a turn-taking scheme is implemented (see Shiio, col. 9, lines 62-67). The turn-taking scheme permits the operation right by properly allocating priorities of permission (e.g. a first-come-first-serve basis) to the users.

In claim 14, on the other hand, if the chat event detector detects a plurality of the events at same chat device destination or at same image representation and/or physical representation of a chat participant, as overlapping events, the operation instruction determiner processes the detected overlapping events according to a specified event processing method.

Shiio does not teach or suggest this feature because in Shiio a plurality of users are requesting to use the same chalkboard, for example, at the same time. In claim 14, the chat event detector *detects* a plurality of events *at the same chat device destination* (e.g. user). As a result, a person having ordinary skill in the art would clearly understand that the feature in Shiio and the feature in claim 14 are directed at two different objectives.

Further, in Shiio, the *users* are placed in a turn-taking scheme, whereas, in claim 14, the determiner processes the detected overlapping *events* according to a specified event processing method. Therefore, in claim 14, the overlapping events are being processed accordingly and, in Shiio, the users are placed in a line accordingly.

Thus, claim 14 is patentable over Suzuki and Shiio, taken alone or in combination thereof.

Claim 15 is further patentable over Suzuki and Shiio, taken alone or in combination thereof, for the additional reasons presented below.

According to Shiio, a turn-taking scheme is implemented to permit operation rights to users by properly allocating priorities of permission (e.g. first-come-first-serve basis). In claim 15, on the other hand, one or a plurality of *detected overlapping events* is sequentially executed. As mentioned above, the turn-taking scheme implemented in Shiio relates to users and not to overlapping events.

Therefore, claim 15 is patentable over Suzuki and Shiio, taken alone or in combination thereof.

Claim 16 is further patentable over Suzuki and Shiio, taken alone or in combination thereof, for the additional reasons presented below.

As mentioned above, Shiio describes a turn-taking scheme related to users wanting to use a chalkboard, for example, at the same time. In claim 16, however, the operation instruction determiner selects one or a plurality of the detected overlapping events according to one or more selection criteria: (1) if same event occurs within a specified time period, ignoring second and subsequent occurrences of the same event, (2) selecting a first or a last event within a specified time, or (3) selecting one or a plurality of the detected overlapping events according to

a priority assigned to each event in the association table. Shiiro cannot teach or suggest such features since Shiiro is only directed to prioritize the user's turn with respect to using a chalkboard, for example.

Therefore, claim 16 is patentable over Suzuki and Shiiro, taken alone or in combination thereof.

Claim 17 is further patentable over Suzuki and Shiiro, taken alone or in combination thereof, for the additional reasons presented below

As mentioned above, Shiiro describes a turn-taking scheme related to users wanting to use a chalkboard at the same time. In claim 17, however, when events occur continuously in a short time, only an operation instruction corresponding to a highest priority event or a specific number of higher priority events is selectively sent to a chat device destination or an image representation and/or physical representation of a chat participant, giving priority to events on a current chat space rather than to events on a sub-chat space, or giving priority to events based on a destination of the corresponding operation instructions. As previously mentioned, priority is given to *users* in Shiiro and not to *events* as recited in claim 17. Therefore, Shiiro cannot teach or suggest such features recited in claim 17.

Thus, claim 17 is patentable over Suzuki and Shiiro, taken alone or in combination thereof.

Conclusion

Applicants respectfully submit that the Examiner has not established a prima facie case of obviousness by preponderance of the evidence for the relevant claims. Reversal of the rejection is, therefore, requested.

Respectfully submitted,

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## VIII. Claims Appendix

1. (PREVIOUSLY PRESENTED) A communication promotion method used in a chat system having a plurality of chat devices which share any of virtual chat spaces being configured on a network and which send and receive messages among themselves, comprising:
  - linking or installing in the chat devices image representations and/or physical representations of chat participants that can be operated according to predetermined operation instructions received by the chat device via the network from a chat administrator of the chat space of the chat devices;
  - detecting by the chat administrator a predetermined event occurring within the chat space;
  - determining at the chat administrator a plurality of different correlated operation instructions that correspond to the detected event in the chat space for operating the image representations and/or the physical representations of the chat participants linked or installed in the chat devices;
  - determining at the chat administrator a plurality of different control instructions for each type of image representations and/or physical representations among the plurality of chat participants linked or installed in the chat devices;
  - determining at the chat administrator different chat device destinations corresponding to the determined plurality of the different operation instructions and the determined plurality of different control instructions for operating the image representations and/or the physical representations of the chat participants linked or installed in the different chat device destinations; and
  - sending by the chat administrator the determined plurality of the different operation instructions and/or control instructions corresponding to the event via the chat system to the determined corresponding different chat device destinations to operate the image representations and/or the physical representations of the chat participants linked or installed in the different chat device destinations, and
  - wherein
    - the image representations and/or physical representations of the chat participants are operated by the sent determined plurality of the different operation instructions and/or control instructions corresponding to the event.

2. (PREVIOUSLY PRESENTED) The communication promotion method set forth in claim 1, wherein an originating address and a destination address of the operation instructions for operating the image representations and/or the physical representations of the chat participants, and an event detection time, are sent to the determined corresponding different chat device destinations together with the operation instructions.

3. (CANCELLED)

4. (CANCELLED)

5. (PREVIOUSLY PRESENTED) An administration device used in a chat system having a plurality of chat devices which share any number of virtual chat spaces being configured on a network and which send and receive messages among themselves, comprising:

an association table that relationally stores a predetermined event occurring in a chat space with participating chat devices, a plurality of predetermined control instructions, and a plurality of predetermined different correlated operation instructions that correspond to the predetermined event,

wherein the plurality of predetermined control instructions correspond to a plurality of types of image representations and/or physical representations among the chat devices, and the plurality of predetermined different correlated operation instructions correspond to a plurality of different chat device destinations to operate image representations and/or physical representations of chat participants that are linked to or installed in the chat device destinations;

a chat event detector detecting a predetermined event in the chat space, based on the association table;

an operation instruction determiner determining the plurality of the different operation instructions for the detected event, based on the association table;

a destination determiner determining the corresponding plurality of the different chat device destinations to be transmitted the determined plurality of the different operation instructions, based on the association table; and

a transmitter transmitting the determined plurality of the different control instructions and/or the determined plurality of the different operation instructions corresponding to the event via the chat system to the determined corresponding chat device destinations to operate the image representations and/or the physical representations of the chat participants that are linked



to or installed in the chat device destinations, and  
wherein

the image representations and/or physical representations of the chat participants are operated by the transmitted determined plurality of the different control instructions and/or the determined plurality of the different operation instructions corresponding to the event .

6. (PREVIOUSLY PRESENTED) The administration device set forth in claim 5, wherein the transmitter transmits an originating address of each determined operation instruction, a destination address of each determined operation instruction, and an event detection time, to each corresponding different chat device destination together with the determined operation instruction.

7. (PREVIOUSLY PRESENTED) The administration device set forth in claim 5, additionally comprising a controller selecting a plurality of operation instructions that correspond to events in the chat space to operate the image representations and/or the physical representations of the chat participants, based on predetermined conditions when the plurality of the operation instructions occur with a same chat device as a chat device destination, and sending the selected plurality of the operation instructions to the same chat device.

8. (PREVIOUSLY PRESENTED) The administration device set forth in claim 5, wherein when the image representations and/or the physical representations of the chat participants are linked to or installed in one of the chat devices, the destination determiner determines one of the plurality of the image representations and/or the physical representations of the chat participants to operate from among the image representations and/or the physical representations of the chat participants, based on the detected event, and  
the transmitter sends a determined operation instruction including a specification of the image representations and/or the physical representations of chat participants to the corresponding chat device destination to operate therein the specified image representations and/or physical representations of the chat participants.

9. (CANCELLED)

10. (PREVIOUSLY PRESENTED) An administration device used in a chat system

having a plurality of chat devices which share any of virtual chat spaces being configured on a network and which send and receive messages among themselves, comprising:

- an association table that relationally stores a predetermined event occurring in a chat space with participating chat devices;

- a plurality of different correlated control instructions that correspond to the type of image representations and/or physical representations among the plurality of chat devices; and

- a plurality of different correlated operation instructions that correspond to the predetermined event,

- wherein the plurality of different correlated operation instructions correspond to a plurality of different chat device destinations to operate image representations and/or physical representations of chat participants that are linked to or installed in the chat device destinations;

- a chat event detector detecting a predetermined event in the chat space, based on the association table;

- a determiner determining the plurality of control instructions and/or the plurality of the different operation instructions for the detected event, based on the association table; and

- a transmitter transmitting the plurality of different control instructions and/or the determined plurality of the different operation instructions corresponding to the event to the plurality of different chat device destinations to operate the image representations and/or the physical representations of the chat participants that are linked to or installed in the chat device destinations, and

- wherein

- the image representations and/or physical representations of the chat participants are operated by the transmitted plurality of different control instructions and/or the determined plurality of the different operation instructions corresponding to the event.

11. (PREVIOUSLY PRESENTED) A computer-readable recording medium recording an administration program controlling a chat administration device in a chat system in which a plurality of chat devices share any of virtual chat spaces operating on a network and send and receive messages among themselves, according to a process comprising:

- preparing an association table that relationally stores a predetermined event occurring in a chat space with participating chat devices, a plurality of predetermined control instructions that describe the type of image representations and/or physical representations of the participating chat devices, and a plurality of predetermined different correlated operation instructions that correspond to the predetermined event,

wherein the plurality of predetermined control instructions and the plurality of predetermined different correlated operation instructions correspond to a plurality of different chat device destinations to operate image representations and/or physical representations of chat participants that are linked to or installed in the chat device destinations;

detecting a predetermined event in the chat space, based on the association table,

determining the plurality of different control instructions for the detected event, based on the association table,

determining the plurality of the different operation instructions for the detected event, based on the association table;

determining the corresponding plurality of the different chat device destinations to be transmitted the determined plurality of the different operation instructions, based on the association table; and

transmitting the determined plurality of the different control instructions and/or the determined plurality of the different operation instructions corresponding to the event via the chat system to the determined corresponding chat device destinations to operate the image representations and/or the physical representations of the chat participants that are linked to or installed in the chat device destinations, and

wherein

the image representations and/or physical representations of the chat participants are operated by the transmitted determined plurality of the different control instructions and/or the determined plurality of the different operation instructions corresponding to the event .

12. (PREVIOUSLY PRESENTED) A computer-readable recording medium recording an administration program controlling a chat administration device used in a chat system having a plurality of chat devices which share any of virtual chat spaces being configured on a network and send and receive messages among themselves, according to a process comprising:

preparing an association table that relationally stores a predetermined event occurring in a chat space with participating chat devices, a plurality of predetermined control instructions that describe the type of image representations and/or physical representations of the participating chat devices, and a plurality of predetermined different correlated operation instructions that correspond to the predetermined event,

wherein the plurality of predetermined control instructions and the plurality of predetermined different correlated operation instructions correspond to a plurality of different

chat device destinations to operate image representations and/or physical representations of chat participants that are linked to or installed in the chat device destinations;

detecting a predetermined event in the chat space, based on the association table;

determining the plurality of different control instructions for the detected event, based on the association table,

determining the plurality of the different operation instructions for the detected event, based on the association table; and

transmitting the determined plurality of the different control instructions and/or the determined plurality of the different operation instructions corresponding to the event to the plurality of different chat device destinations to operate the image representations and/or the physical representations of the chat participants that are linked to or installed in the chat device destinations, and

wherein

the image representations and/or physical representations of the chat participants are operated by the transmitted determined plurality of the different control instructions and/or the determined plurality of the different operation instructions.

13. (PREVIOUSLY PRESENTED) The chat administration device according to claim 5, wherein the chat event detector detects the predetermined event from among a plurality of association table events comprising participate in the chat space, withdraw from the chat space, a number of chat participants in the chat space exceeds a predetermined number, a change in a mode or a topic of the chat space, a chat statement has not been made for longer than a specified time, a statement of a chat participant nickname or name, chatting is frequent, and specifying a chat participant image representation and/or physical representation.

14. (PREVIOUSLY PRESENTED) The chat administration device according to claim 5, wherein if the chat event detector detects a plurality of the events at same chat device destination or at same image representation and/or physical representation of a chat participant, as overlapping events, the operation instruction determiner processes the detected overlapping events according to a specified event processing method.

15. (PREVIOUSLY PRESENTED) The chat administration device according to claim 14, wherein the specified event processing method is one of sequentially executing the detected overlapping events, and selectively executing one or a plurality of the detected overlapping

events.

16. (PREVIOUSLY PRESENTED) The chat administration device according to claim 5, wherein if the chat event detector detects a plurality of the events at same chat device destination or same image representation and/or physical representation of a chat participant, as overlapping events, the operation instruction determiner selects one or a plurality of the detected overlapping events according to one or more selection criteria comprising:

- if same event occurs within a specified time period, ignoring second and subsequent occurrences of the same event,
- selecting a first or a last event within a specified time, or
- selecting one or a plurality of the detected overlapping events according to a priority assigned to each event in the association table.

17. (PREVIOUSLY PRESENTED) The chat administration device of claim 16, wherein the event priority assignment comprises:

- when events occur continuously in a short time, only an operation instruction corresponding to a highest priority event or a specific number of higher priority events is selectively sent to a chat device destination or an image representation and/or physical representation of a chat participant,
- giving priority to events on a current chat space rather than to events on a sub-chat space, or
- giving priority to events based on a destination of the corresponding operation instructions.

18. (CANCELED)

19. (PREVIOUSLY PRESENTED) A system comprising:

- a plurality of different chat devices sharing a virtual chat space on a network, the chat devices configured to send and receive messages among themselves over the network;
- a plurality of different correlated control instructions that correspond to a specific type of image representations and/or physical representations among the plurality of chat devices;
- a plurality of different correlated operation instructions that correspond to a predetermined event;
- a chat event detector detecting a predetermined event occurring in the chat space and

the types of image representations and/or physical representations existing in the chat space during the event, based on an association table that relationally stores predetermined events and types of image representations and/or physical representations;

a determiner determining the plurality of different correlated operation instructions for the detected event, based on the association table, and for determining the plurality of different correlated control instructions for the detected types of image representations and/or physical representations existing in the virtual chat space, based on an association table;

a transmitter transmitting the plurality of different control instructions and/or the determined plurality of different operation instructions corresponding to the event so that the plurality of different chat devices can operate the image representations and/or physical representations in the chat space, and wherein,

the image representations and/or physical representations of the chat participants are operated by the transmitted plurality of different control instructions and/or the determined plurality of the different operation instructions corresponding to the event.

20. (CANCELED)

21. (PREVIOUSLY PRESENTED) A system comprising:

a virtual chat space on a network;

an association table, corresponding to the virtual chat space, that relationally stores a predetermined event, a predetermined control instruction, and a correlated operation instruction corresponding to the predetermined event; and

a plurality of different chat devices sharing the virtual chat space, the chat devices using the predetermined event and/or the predetermined control instruction to produce image representations and/or physical representations in the virtual chat space.

**IX. Evidence Appendix**

Not applicable.

**X. Related Proceedings Appendix**

Not applicable.